

1 CHRISTOPHER CHIOU
Acting United States Attorney
2 District of Nevada
Nevada Bar No. 14853

3 BRIAN W. IRVIN
Assistant United States Attorney
4 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
5 (702) 388-6336
Brian.Irvin@usdoj.gov

6 *Attorneys for the United States*

7
8 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 Hortencia Suazo,

10 Plaintiff,

11 v.

12 United States of America,

13 Defendant.

Case No. 2:21-cv-01822-JAD-EJY

**Stipulation to Extend Time for United
States to Respond to Plaintiff's
Complaint (First Request)**

14 Pursuant to Local Rule IA 6-1, Defendant United States of America requests a 30-
15 day extension to file its answer or otherwise plead in response to Plaintiff's Complaint
16 (ECF No. 1).

17 This is a Federal Tort Claims Act ("FTCA") action arising out of a motor vehicle
18 accident. Defendant was served with the Summons and Complaint on October 14, 2021.
19 Under Fed. R. Civ. P 12(a)(2), Defendant must answer or otherwise respond to Plaintiff's
20 Complaint by December 13, 2021. Counsel for Defendant, AUSA Brian Irvin, will be
21 leaving the District of Nevada later this month. Following his departure, this case will be
22 reassigned to another AUSA. Defendant requires additional time for the newly assigned
23 AUSA to review the file before responding to the Complaint. Counsel for Defendant
24 discussed an extension with counsel for Plaintiff. The parties agreed to give Defendant an

additional thirty (30) days, or by January 12, 2022, to answer or otherwise plead.

Accordingly, United States respectfully requests the Court grant this stipulation and extend the time for Defendant to answer or other respond by 30 days, or by **January 12, 2022.**

Respectfully submitted this 2nd day of December 2021.

<p>Dated this 2nd day of December 2021.</p> <p>STOVALL & ASSOCIATES</p> <p><i>s/ Leslie M. Stovall</i></p> <hr/> <p>Leslie M. Stovall, ESQ. Nevada Bar No. 2566 2301 Palomino Lane Las Vegas, NV 89107 Telephone: (702)258-3034 Facsimile: (702) 258-0093 <i>Attorney for Plaintiff</i></p>	<p>Dated this 2nd day of December 2021.</p> <p>UNITED STATES ATTORNEYS OFFICE</p> <p><i>s/ Brian W. Irvin</i></p> <hr/> <p>Brian W. Irvin, ESQ. 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 Telephone: (702) 388-6336 <i>Attorney for Defendant</i></p>
--	--

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 2, 2021